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Attorney for ANDRES AARON CASTRO

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ANDRES AARON CASTRO  
  
Defendant.

CASE NO. 2:23-CR-00270-TLN

STIPULATION REGARDING RESETTling  
OF STATUS CONFERENCE AND  
EXCLUDABLE TIME PERIODS UNDER  
SPEEDY TRIAL ACT; FINDINGS AND  
ORDER

DATE: March 14, 2024  
TIME: 9:00 a.m.  
COURT: Hon. Troy L. Nunley

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, Special Assistant United States Attorney Caily Nelson, and defendant ANDRES CASTRO, by and through his counsel of record, Kellan Patterson, hereby stipulate as follows:

1. The Indictment was returned on October 19, 2023, and the Honorable Troy L. Nunley was assigned.
2. By previous stipulation and order, the matter was continued with an exclusion of time, under Local Code T4 from October 26, 2023, to January 11, 2024.
3. By previous stipulation and order, the matter was continued with an exclusion of time, under Local Code T4 from January 11, 2024, to February 15, 2024.
4. Parties appeared before the Court on February 15, 2024. The court was advised that parties had entered into a protective order which resulted in a production of documents and

1 information for defendant's review. The matter was continued with an exclusion of time, under  
2 Local Code T4 from February 15, 2024, to March 14, 2024.

3 5. As a result of the recent production, Defendant must consult experts and anticipate  
4 serving a formal discovery requests on Plaintiff to ensure all ancillary information and documents  
5 related to the government's production are produce to fully analyze Defendant's rights pertaining  
6 to defending the claims and assessing sentencing guidelines.

7 6. By this stipulation, the defendant, through counsel, move to set the status  
8 conference on **May 23, 2024, at 9:30 a.m.**

9 7. The government and the defendant, through counsel, agree and stipulate, and  
10 request that the Court find the following:

11 a) The government has produced discovery including law enforcement  
12 reports, lab reports, search warrants, and photographs, and pursuant to a protective order,  
13 video and audio recordings. Much, if not all, of the additional discovery provided  
14 pursuant to the protective order is in Spanish.

15 b) On February 13, 2024, Counsel agreed to the government's proposed  
16 protective order from November 12, 2023.

17 c) Counsel desires additional time to consult with his client, to review and  
18 copy discovery for this matter, and to otherwise prepare for trial.

19 d) Counsel believes that failure to grant the above-requested continuance  
20 would deny him the reasonable time necessary for effective preparation, taking into  
21 account the exercise of due diligence.

22 e) The government does not object to the continuance.

23 f) Based on the above-stated findings, the ends of justice served by  
24 continuing the case as requested outweigh the interest of the public and each defendant in  
25 a trial within the original date prescribed by the Speedy Trial Act.

26 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §  
27 3161, et seq., within which trial must commence, the time period March 14, 2024, to May  
28 23, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)

[Local Code T4] because it results from a continuance granted by the Court at each defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

8. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED

Dated: March 12, 2024

PHILLIP A. TALBERT  
United States Attorney

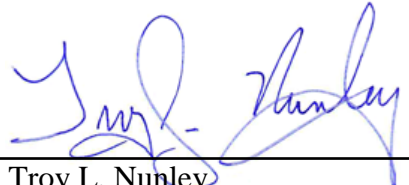
/s/ CAILY NELSON  
CAILY NELSON  
Special Assistant United States Attorney

Dated: March 12, 2024

/s/ KELLAN PATTERSON  
KELLAN PATTERSON  
Counsel for Defendant  
ANDRES AARON CASTRO

**ORDER**

IT IS SO FOUND AND ORDERED this 12<sup>th</sup> day of March, 2024.

  
Troy L. Nunley  
United States District Judge